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November 3, 2015

Hon. Katherine B. Forrest  
United States District Judge  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: *Leibovitch, et al. v. United States Department of State, et al.*  
Docket no. 15-CV-6133 (LBF)

Dear Judge Forrest,

We represent the plaintiff in the above referenced matter.

We write to request that the initial conference presently scheduled for December 1, 2015 be adjourned to a later date since plaintiff has not yet completed service of process (nor has the time expired to do so) and no defendant has yet appeared.

Assuming that service will be completed by the December 3 deadline, and assuming the defendants will appear 60 days thereafter as they are entitled under Fed. R. Civ. P. 12(a)(2), a conference date in mid-February would seem to make sense and in compliance with Fed. R. Civ. P. 16(b)(2).

Thank you for your attention to this matter.

Respectfully yours,

  
Robert J. Tolchin